

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHANE GILBERTSON,

Plaintiff,

v.

TIBURON FINANCIAL, LLC. a Nebraska  
Limited Liability Company and  
JPMORGAN CHASE BANK, N.A. f/k/a  
CHASE HOME FINANCE, LLC, a  
Delaware Limited Liability Company

Defendants.

Case No. 14-cv-09604

Hon. Charles R. Norgle, Sr., Judge

**DEFENDANT JPMORGAN CHASE BANK, N.A.'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant JPMorgan Chase Bank, N.A. ("Chase"), through its undersigned counsel moves for entry of an order granting it an additional 30 days, until March 4, 2015, to answer or otherwise plead to the Complaint for the following reasons:

1. The Complaint in this action was filed on December 1, 2014.
2. Defendant Chase received the Summons and Complaint in this action on January 12, 2015.
3. The Complaint contains 71 paragraphs and asserts five counts, including violation of the Fair Debt Collection Practices Act, violation of the Illinois Consumer Fraud and Deceptive Business Practices Act, claims for breach of contract, promissory estoppel and fraudulent misrepresentation.
4. Chase recently retained counsel, who requires time beyond February 2, 2015, when Chase's responsive pleading is due, to complete an investigation and prepare a response.

5. Counsel for Chase, Victoria Collado, spoke with counsel for Plaintiff, Penelope Bach, on February 2, 2015 regarding this motion. Ms. Bach indicated that Plaintiff does not oppose a 30-day extension of time.

Wherefore, for the foregoing reasons, Defendant Chase requests entry of an order granting it an additional 30 days, until March 4, 2015, to answer or otherwise plead to the complaint.

Respectfully submitted,

Date: February 2, 2015

**DEFENDANT JPMORGAN CHASE BANK,  
N.A.**

By: /s/ Victoria R. Collado  
One of its attorneys

Victoria R. Collado  
Burke, Warren, MacKay & Serritella, P.C.  
330 North Wabash Avenue, 21st Floor  
Chicago, Illinois 60611-3607  
Telephone: (312) 840-7000  
Facsimile: (312) 840-7900

1858254.1